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10 Attorneys for Defendant
11 Twitter, Inc.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

17 JOHN DOE, A MINOR CHILD, BY AND
THROUGH HIS NEXT FRIEND JANE DOE,

18 Plaintiff,

19 v.

20 TWITTER, INC.,

21 Defendant.

Case No. 3:21-cv-00485-JCS

**DECLARATION OF KYLE C. WONG IN
SUPPORT OF DEFENDANT TWITTER, INC.'S
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

Judge: Hon. Joseph C. Spero
Trial Date: Not yet set

1 I, Kyle C. Wong, declare as follows:

2 1. I am an attorney licensed to practice law in California and am special counsel at
3 Cooley, LLP and counsel of record for Defendant Twitter, Inc. (“Twitter”) in the above captioned
4 matter. I make this declaration based on my personal knowledge of this matter and information I
5 obtained following a reasonable investigation of the events described below. If called as a witness,
6 I could and would testify competently to the matters stated herein.

7 2. **Exhibit 1** is a true and correct copy of an article entitled “Twitter says it’s getting
8 better at detecting abusive tweets without your help,” published by the news website Vox on April
9 16, 2019, as the page appeared on March 10, 2021, and is publicly available on Vox’s website at
10 <https://www.vox.com/2019/4/16/18410931/twitter-abuse-update-health-technology-harassment>.

11 3. **Exhibit 2** is a true and correct copy of a report entitled “A healthier Twitter:
12 Progress and more to do,” published by Twitter on its online blog on April 16, 2019, as the page
13 appeared on March 10, 2021, and is publicly available on Twitter’s website at
14 https://blog.twitter.com/en_us/topics/company/2019/health-update.html.

15 4. **Exhibit 3** is a true and correct copy of a report entitled “Rules Enforcement,”
16 published by Twitter on its website on January 11, 2021, as the page appeared on March 10, 2021,
17 and is publicly available on Twitter’s website at [https://transparency.twitter.com/en/reports/rules-](https://transparency.twitter.com/en/reports/rules-enforcement.html#2020-jan-jun)
18 [enforcement.html#2020-jan-jun](https://transparency.twitter.com/en/reports/rules-enforcement.html#2020-jan-jun).

19 5. **Exhibit 4** is a true and correct copy of the homepage of the Technology Coalition,
20 which identifies Twitter (by its iconic logo) as one of the members of the Technology Coalition, as
21 the page appeared on March 10, 2021, and is publicly available on the Technology Coalition
22 website at <https://www.technologycoalition.org/>.

23 6. **Exhibit 5** is a true and correct copy of an announcement entitled “The Technology
24 Coalition Announces Project Protect: A plan to Combat Online Child Sexual Abuse,” posted by the
25 Technology Coalition on its website on June 10, 2020, as the page appeared on March 10, 2021,
26 and is publicly available on The Technology Coalition’s website at [https://www.technologycoaliti](https://www.technologycoalition.org/2020/05/28/a-plan-to-combat-online-child-sexual-abuse)
27 [on.org/2020/05/28/a-plan-to-combat-online-child-sexual-abuse](https://www.technologycoalition.org/2020/05/28/a-plan-to-combat-online-child-sexual-abuse).

28 7. **Exhibit 6** is a true and correct copy of the @BrossStraight Twitter account as the

1 page appeared on March 10, 2021, which shows the account is suspended, and is publicly available
2 on Twitter's website at <https://twitter.com/BrossStraight/>.

3 8. **Exhibit 7** is a true and correct copy of one of Twitter's policies entitled "Ban
4 Evasion Policy," published by Twitter on its website and last updated in October 2020, as the page
5 appeared on March 10, 2021, and is publicly available on Twitter's website at
6 <https://help.twitter.com/en/rules-and-policies/ban-evasion>.

7 9. **Exhibit 8** is a true and correct copy of one of Twitter's policies entitled "Illegal or
8 certain regulated goods or services," published by Twitter on its website and last updated in April
9 2019, as the page appeared on March 10, 2021, and is publicly available on Twitter's website at
10 <https://help.twitter.com/en/rules-and-policies/regulated-goods-services>.

11 I declare under penalty of perjury that the foregoing is true and correct. This declaration
12 was executed on March 10, 2021 in San Francisco, California.

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14 Dated: March 10, 2021

15 /s/ Kyle C. Wong

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